



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

MAY 14 2019

MEMORANDUM

SUBJECT: Justification of CA900CR
Solutia J. F. Queeny Site, 200 Russell Street, St. Louis, Missouri
EPA ID No. MOD004954111

FROM: Bruce Morrison, Project Manager *BM*
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THRU: Leslye Werner, Acting Chief *LW*
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TO: File

Facility History

The Solutia J. F. Queeny site is located at 200 Russell Street, St. Louis, Missouri, within an industrial area of south St. Louis. The facility occupies approximately six acres in an area zoned for industrial use.

While in operation from 1901 to 2006, the J. F. Queeny facility manufactured over 200 products using over 800 raw materials. The major products included, but are not limited to, the following: process chemicals such as maleic anhydride, fumaric acid, toluene, sulfonic acid, and plasticizers such as phthalate esters and toluene sulfonamides; synthetic functional fluids such as Pydrauls, Skydrols and coolanols; agricultural chemicals such as Lasso (i.e., acetanilides or alachlor); and polychlorinated biphenyls. The Facility is currently subject to a RCRA permit issued to Monsanto in 1989 (Permit No. MOD004954111), jointly by the EPA and Missouri Department of Natural

Resources MDNR. In 1997, Monsanto transferred its chemical businesses to Solutia, Inc. (Solutia). In 2008, Solutia sold the majority of the facility property to SWH Investments II and Environmental Operations, Incorporated. As a result of numerous facility investigations over the last four decades, four primary areas of concern associated with chemical releases to the environment were identified and investigated.

In 2009, the EPA, SWH and EOI entered into a consensual administrative order to complete site investigations and implement corrective measures to address site contamination. Subsequently, EOI completed environmental investigations at the site and performed several interim corrective measures to

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address site contamination. These corrective measures consisted of the removal of several hundred tons of soil contaminated with PCBs and the chemical oxidation of groundwater contaminated with multiple

volatile organic compounds. The EPA issued a Statement of Basis for public comment on February 2, 2018, proposing final corrective measures for the site. The EPA selected the corrective measures final remedy on April 30, 2018. As part of the final remedy, an Environmental Covenant restricting future use and activity on the site property was recorded in the St. Louis City Courthouse on April 26, 2018. The CA800 was attained for the site on March 19, 2019.

Recommendation

The site is partially redeveloped and currently undergoing further redevelopment for commercial/industrial use. Periodic inspections and groundwater monitoring will be performed at the site in accordance with approved work plans. A CA900CR, Corrective Actions Performance Standards Attained – Controls Required will be entered into RCRAInfo for this facility to document this determination. The effective date of this action as entered into RCRAInfo will be the date this memorandum is finalized.